

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Tanya L. Cain aka Tanya L. Chambers-Cain Timothy D. Cain Debtor(s) CITIMORTGAGE, INC. c/o CENLAR FSB Movant v. Tanya L. Cain aka Tanya L. Chambers-Cain Timothy D. Cain and Scott Waterman, Esquire Respondents	17-16840 AMC Chapter 13 Proceeding
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------

CERTIFICATION OF DEFAULT

CITIMORTGAGE, INC. c/o CENLAR FSB, a secured creditor in the above captioned bankruptcy case, by and through its counsel, Harry B. Reese, Esquire of the law firm of POWERS KIRN, LLC, hereby files this certification, and states:

1. I am the attorney responsible for handling the instant matter for CITIMORTGAGE, INC. c/o CENLAR FSB, and I have sufficient knowledge to make this certification on its behalf.
2. On 11/16/2020, an Order was issued by this Court approving the Stipulation resolving CITIMORTGAGE, INC. c/o CENLAR FSB's motion for relief from stay, a copy of which Order is attached hereto as **EXHIBIT A**. The Order provides for the cure of post-petition arrearage, and that in the event the Debtor fails to make the payments the secured creditor is permitted ex-parte relief to vacate the stay, with notice to the trustee, debtor(s), and debtor's attorney, if any.
3. Debtor(s) has/have failed to comply with the aforesaid order by either missing payments and/or by failing to make the correct payments as summarized on the Notice of Default which was sent to all interested parties on 08/09/2022. A copy of the Notice of Default is attached as **EXHIBIT B**.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay without numerous court appearances.
5. I certify the above statements to be true. I am aware that if the above statements are willfully false, I am subject to punishment.

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

Dated: September 1, 2022

By: /s/ Harry B. Reese, Esquire

Harry B. Reese, Esquire

ID# 310501

Eight Neshaminy Interplex, Suite 215

Treose, PA 19053

Telephone: 215-942-2090

Attorney for Movant